



3. Defendant hereby requests an order allowing a 10-day extension of time from February 2, 2018, up to and including February 12, 2018, to file Plaintiff's Response to Federal Defendants' Motion for Summary Judgment.
4. Plaintiff seeks this extension of time for the following reasons:
  - (a) Plaintiff filed a Motion for Extension of Time and Motion for Appointment of Counsel with the court on December 1, 2017.
  - (b) Defendant filed a Motion for Summary Judgment with the Court on December 4, 2017. On that date the Court issued an Order granting Plaintiff's Motion for Extension of Time and denying Plaintiff's Motion for Appointment of Counsel. Also on that date, the court set the deadline for Plaintiff's Response to Defendants' Motion for Summary Judgment to January 3, 2018.
  - (c) Plaintiff retained me as counsel on December 22, 2017.
  - (d) The same day, December 22, 2017, I conferred with counsel for Federal Defendants, James Cox, requesting 30 additional days to respond to Federal Defendants' Motion for Summary Judgment. Mr. Cox agreed to the request.
  - (e) On December 26, 2017, I filed a Notice of Appearance of Counsel for Plaintiff in this case and also filed an Unopposed Motion for Extension of Time to Respond to Federal Defendants' Motion for Summary Judgment.
  - (f) On December 30, 2017, the Court issued an Order granting Plaintiff's Motion for Extension of Time and set the deadline for Plaintiff's Response to Defendants' Motion for Summary Judgment to February 2, 2018.
  - (g) We have been gathering the materials for this matter since our initial engagement and the volume of documents relevant to it is extensive. We have been diligently working on

become familiar with the facts of the case, and preparing the response, but are concerned that we do not have time to prepare an adequate response in time by February 2, 2018. Therefore, we are requesting an extra ten days, to February 12, 2018. We will not seek another extension of time.

(h) On January 18, 2018, I conferred with counsel for Federal Defendants, James Cox, requesting 10 additional days to respond to Federal Defendants' Motion for Summary Judgment. Mr. Cox agreed to the request.

DATED this 19th day of January, 2018.

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